## DAVIS, NDANUSA, IKHLAS & SALEEM, LLP

26 Court Street Suite #603 Brooklyn, NY 11242 Tel: (718) 783-6819 Fax: (855) 852-4742 www.dnislaw.com

March 18, 2025

## **VIA ECF**

Hon. Judge Elizabeth C. Coombe United Stated District Court

RE: Taal et al. v. Trump et al.(25-cv-00335)

Dear Honorable Elizabeth C. Coombe:

Our office represents Momodou Taal, Mukoma Wa Ngugi and Sriram Parasurama (collectively "Plaintiffs") in the above captioned matter. We are writing to update the Court regarding the status of the filing of our Affidavits of Service in this case.

In order to meet the Court's deadline, we have filed our Affidavits of Service, which demonstrate service via certified mail upon the U.S. Department of Homeland Security, Donald J. Trump, and Kristi Noem (collectively, "Defendants").

U.S. Attorney Daniel Hanlon of the Northern District of New York ("AUSA Hanlon") was personally served on March 17, 2025. We have made several attempts to contact our process server via email and phone regarding the Affidavit of Service for AUSA Hanlon, but have not received a response. We anticipate receiving the Affidavit of Service tomorrow morning. We have taken the necessary steps to notify AUSA Hanlon about this matter and its filings. This includes faxing all initiating documents, Notice of Motion and Motion for TRO, Memorandum in Support and all supporting exhibits to AUSA Hanlon on Monday, March 16, 2025. Additionally, we spoke with Eleanor Page of the U.S. Attorney's office today around 1 p.m. to inform them of our service and of tomorrow's hearing.

We respectfully request that the Court accept the filed Affidavits of Service and allow us to file the Affidavit of Service for AUSA Hanlon tomorrow.

We thank the Court for its consideration of our request.

Dated: March 18, 2025

Respectfully submitted,

By: /s/ Mohammad Akif Saleem

Mohammad Akif Saleem, Esq.

Bar Number: 4842753

Davis Ndanusa Ikhlas & Saleem LLP

26 Court Street Suite 603 Brooklyn, NY 11242

Email: msaleem@dnislaw.com

Phone: (718) 783-6819

Counsel for Plaintiffs

cc: Counsel of Record (via ECF)